

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

CRAIG A. WASHINGTON, AND  
OTHERS SIMIARLY SITUATED  
INDIVIDUALS  
Plaintiffs,

V.

THE STATE BAR OF TEXAS;  
ITS BOARD OF DIRECTORS;  
THE COMMISSION FOR LAWYER  
DISCIPLINE; JUDITH DEBERRY;  
TANYA GALINGER; AND GEORGE  
GALLAGHER

Defendants,



Case No. 1:23-cv-00526-JRN

## JURY DEMANDED

**MOTION FOR DEFAULT JUDGMENT AGAINST GEORGE GALLAGHER IN HIS  
INDIVIDUAL CAPACITY**

To The Honorable Judge of Said Court:

Now Comes Plaintiff and files this Motion for Default Judgment  
against George Gallagher in his individual capacity, and for cause would  
show:

1. Defendant Gallagher was sued in his Individual Capacity and served on July 3, 2023. Please see attached Exhibit A.
2. The Attorney General of Texas has filed an Answer for Defendant Gallagher in his official capacity alleging that Defendant Gallagher is immune from suit. The Court has not

ruled on whether the Attorney General can represent Defendant Gallagher in any capacity as to do so is a gift of public funds which is violation of The Texas Constitution.

3. Thus, no one has answered on behalf of Defendant Gallagher in his individual capacity and the time allowed for him to answer has long since passed.

Respectfully submitted,

BY: /s/Timberly Davis  
**TIMBERLY J. DAVIS**  
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**CERTIFICATE OF CONFERENCE**

I certify that a copy of this motion has been emailed to Attorney Scot Graydon at [scot.graydon@oag.texas.gov](mailto:scot.graydon@oag.texas.gov) by my office on September 14, 2023 and Attorney Graydon did not respond with his position to the filing of this response.

/s/Timberly J. Davis  
**Timberly J. Davis**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document will be served in accordance with the Federal Rules of Civil Procedure upon all Defendants by CM/ECF on September 15, 2023.

/s/Timberly J. Davis  
**Timberly J. Davis**